

### **REMARKS/ARGUMENTS**

Prior to entry of this amendment, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-43 were pending in this application. Claims 1, 5, 6, 14, 24, and 39 have been amended, claims 44-46 have been added, and no claims have been canceled herein. Therefore, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-46 are now pending in this application. The applicants respectfully request reconsideration of this application for at least the reasons presented below.

#### **35 U.S.C. § 102 Rejection, SiteMinder**

Claims 39-43 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Netegrity, Inc., *SiteMinder Policy Server Operations Guide*, Version 4.0, published 1997 (hereinafter "SiteMinder") The Applicant respectfully submits the following arguments pointing out significant differences between claims 39-43 submitted by the Applicants and SiteMinder.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully argue that SiteMinder fails to disclose each and every claimed element. For example, SiteMinder fails to disclose, either expressly or inherently, performing a first step of a workflow with a first program and performing a second step of the workflow with a second program.

Claim 39, upon which claims 40-46 depend, recites in part "performing a first step of said first workflow with a first program to affect the target identity profile, wherein the first program comprises one of a user manager, a group manager, and an organization manager; and performing a second step of said first workflow with a second program, wherein the second program comprises one of the user manager, the group manager, and the organization manager

and wherein the second program is different from the first program." The cited portions of SiteMinder fail to disclose, either expressly or inherently, a cross-application workflow, i.e., performing a first step of a workflow with a first program and performing a second step of the workflow with a second program. For at least these reasons, the rejection is improper and claims 39-46 should be allowed.

### **35 U.S.C. §103 Rejection, Du in view of SiteMinder**

Claims 1-11, 13-21, 23-31 and 33-36 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,041,306, to Du et al. (hereinafter "Du") in view of SiteMinder. The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation.

As noted previously, the cited portions of SiteMinder relate to policies and policy domains (p.235-237 and 325-328) and responding to requests for resources (p. 301-304). Under SiteMinder, policies, which may be grouped together into policy domains, control a user's access to resources. Resource within a policy domain, i.e., resource to which a policy domain applies, can be further grouped into realms. Access to the resource is controlled by rules defined for the realm that contains the requested resource. (See pages 235 and 325) The Office Action also cites portions of SiteMinder directed to registration services and allowing a registered user to

modify a user profile. See pages 419-435. In this portion of SiteMinder, the user profiles are treated consistent with the treatment of other resources. That is, an administrator can define a registration rule for a particular realm. The rule is applied to control access to the realm that contains the user profile.

However, the cited portions of SiteMinder do not disclose, expressly or inherently, receiving a user selection of a workflow from a plurality of workflows to affect a target identity profile. Rather, the cited portion of SiteMinder directed to allowing a registered user to modify a user profile teaches defining only a single rule for registration services for a particular domain. Furthermore, even if SiteMinder were to allow definition of multiple registration rules for a domain or realm, the cited portions of SiteMinder do not disclose allowing the user to select between the rules. Rather, under the cited portions of SiteMinder, the user is forced to use whatever rule the administrator defines for the realm containing that user profile.

In response to these arguments, the final Office Action and Advisory Action seem to contend that since SiteMinder teaches each user having a profile and allowing a user to modify his profile, then SiteMinder allegedly teaches allowing a user to select a workflow for doing so. For example, the final Office Action argues that:

"SiteMinder teaches receiving a user selection of a first workflow to affect the target identity profile, because SiteMinder teaches that each user of the system has an associated identity profile, and that the system may be configured with a policy for user self-registration, i.e., a workflow, which contains steps for users to modify their own profiles." (Final Office Action page 4, citing SiteMinder p. 398 and 419-435)

However, the Applicants respectfully contend that allowing a user to modify his profile is not the same as allowing the user to select a workflow or policy for doing so. Rather, the cited portions of SiteMinder, including those quoted in the final Office Action, seem to support the one-to-one relationship between a user and a policy. For example, the portion of the final Office Action quoted above correctly indicates that the system may be configured with a

(singular) policy for user self-registration. Furthermore, the final Office Action also points out SiteMinder's teaching of "bindings to link a user with a policy." (Final Office Action page 4, citing SiteMinder p. 326-328 and Ch. 12) This seems to strongly suggest that SiteMinder does NOT allow a user to select a policy from a plurality of policies. Rather, as noted above, the user is limited to the policy defined by the administrator for the realm which contains the requested resource.

Du is directed to "a system and method for performing flexible workflow process execution in a distributed workflow management system." (Col. 2, lines 59-61) Under Du "the distributed workflow management system is formed by a computer network comprising a plurality of computers." (Col. 3, lines 1-3) "A workflow process management system operates on one or more of the computers to control the computer network in executing the workflow process." (Col. 3, lines 4-7) "Each workflow process includes a sequence of activities, each of which is ordinarily performed by one of the computer systems." (Col. 4, lines 34-36) "The WFPM system provides procedural automation of the workflow process by managing the sequence of process activities and the invocation of appropriate user, machine or microprocessor-controlled device resources associated with the various activity steps." (Col. 4, lines 51-56) That is, Du teaches controlling distribution of processing of tasks between a number of computers in a network. However, Du does not teach or suggest receiving a user selection of a workflow from a plurality of workflows to affect a target identity profile.

The combination of references is no more relevant to the pending claims than either reference alone since neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow from a plurality of workflows to affect a target identity profile. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach policies for controlling access to user profiles or other resources where the user is forced to use whatever policy the administrator defines for the realm containing the user profile.

Claim 1, upon which claims 2-11, 13, and 34-36 depend, claim 14, upon which claims 15-21 and 23 depend, and claim 24, upon which claims 25-31 and 33 depend, each recite in part "identifying a plurality of workflows that perform said task and are associated with groups that include said target identity profile, said plurality of workflows includes said first workflow, reporting said plurality of workflows to a user, receiving from the user a selection of said first workflow from the plurality of workflows, and performing one or more steps of said first workflow." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow to from a plurality of workflows. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach a policy for controlling access to resources in a realm where the user is forced to use whatever policy the administrator defines for the realm containing the requested resource. For at least these reasons, the rejection is improper and claims 1-11, 13-21, 23-31, and 33-36 should be allowed.

Claim 39, upon which claims 40-46 depend, recites in part "identifying a plurality of workflows that perform the task and are associated with groups that include the user associated with the target identity profile; reporting the plurality of workflows in response to the request; receiving a user selection of a first workflow from the plurality of workflows." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow to affect a target identity profile. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach a policy for controlling access to resources in a realm where the user is forced to use whatever policy the administrator defines for the realm containing the requested resource. For at least these reasons, the rejection is improper and claims 39-46 should be allowed.

New claims 44-46 are further thought to be allowable for additional reasons. For example, neither SiteMinder or Du teach or suggest, alone or in combination, an event catalog as recited in claim 45 or one or more parameters in the event catalog for passing information

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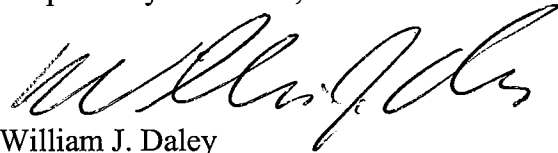
between the first program and the second program as recited in claim 46. For at least these additional reasons, the new claims are also thought to be allowable.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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